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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JOHN DOE,

Plaintiff,

v.

THE BOARD OF REGENTS OF THE
UNIVERSITY SYSTEM OF GEORGIA,
G.P. "BUD" PETERSON, *President of
the Georgia Institute of Technology, sued
in his official and personal capacities,*
JOHN M. STEIN, *Dean of Students and
Vice President of Student Life at the
Georgia Institute of Technology, sued in
his official and personal capacities,* and
PETER PAQUETTE, *Assistant Dean of
Students, Director of the Office of Student
Integrity & Deputy Title IX Coordinator
for Students at the Georgia Institute of
Technology, sued in his official and
personal capacities,*

Defendants.

Civil Action File No.

1:15-cv-4079-SCJ

DECLARATION OF JUSTIN DILLON IN SUPPORT OF JOHN DOE'S
MOTION FOR A PRELIMINARY INJUNCTION

I, JUSTIN DILLON, pursuant to 28 U.S.C. § 1746, hereby declare the following under penalty of perjury:

1. I am a partner at the law firm of Kaiser, LeGrand & Dillon PLLC, counsel for Plaintiff in this litigation. I am a member in good standing of the bars of the District of Columbia and the Commonwealth of Virginia. My motion to practice Pro Hac Vice in this Court is being filed concurrently with this declaration. I submit this declaration in support of Plaintiff's Motion for a Preliminary Injunction. I have personal knowledge of the statements contained in this declaration, the facts set forth are true to the best of my knowledge, and, if called as a witness, I could and would testify competently to the statements contained in this declaration.

2. Attached as **Exhibit A** is a true and correct copy of a [REDACTED] [REDACTED] at the Georgia Institute of Technology ("Georgia Tech" or "the University"), which was provided to me during the course of my representation of Mr. Doe.

3. Attached as **Exhibit B** is a true and correct copy of a news article entitled "Georgia Tech investigating 'rapebait' e-mail," published by *The Washington Post* on October 8, 2013, and available at

<https://www.washingtonpost.com/news/answer-sheet/wp/2013/10/08/georgia-tech-investigating-rapebait-e-mail/>.

4. Attached as **Exhibit C** is a true and correct copy of a news article entitled “Georgia Tech Frat Email About ‘Luring Your Rapebait’ Condemned By Everyone,” published by *The Huffington Post* on October 8, 2013, and available at http://www.huffingtonpost.com/2013/10/08/georgia-tech-frat-email-rapebait_n_4063101.html.

5. Attached as **Exhibit D** is a true and correct copy of an investigative report entitled “Secretive Justice: How Georgia colleges handle rape on campus,” published by *The Atlanta Journal-Constitution* on April 18, 2015, and available at <http://investigations.myajc.com/campusjudiciary/>.

6. Attached as **Exhibit E** is a true and correct copy of Georgia Tech’s Student Sexual Misconduct Policy, which became effective February 2012 and was last revised October 2014.

7. Attached as **Exhibit F** is a true and correct copy of a letter, dated September 28, 2015, to John M. Stein in connection with a student disciplinary proceeding regarding the Phi Delta Theta fraternity at Georgia Tech. The document was published by the NBC-affiliated television station, WXIA-TV, in

Atlanta, GA, and is available at

http://archive.11alive.com/assetpool/documents/151015064601_LETTE.pdf.

8. Attached as **Exhibit G** is a true and correct copy of a photograph of [REDACTED]

[REDACTED]

[REDACTED]

9. Attached as **Exhibit H** is a true and correct copy of a [REDACTED]

[REDACTED]

[REDACTED]

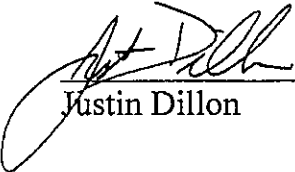
[REDACTED]

10. Attached as **Exhibit I** is a true and correct copy of an excerpt of a sanction imposed by Peter Paquette on a male Georgia Tech student. The sanction requires the student to “read the book *Guyland* by Michael Kimmel and write a 5 page reflection about the book.” This excerpt was provided to me during the course of my representation of Mr. Doe.

11. Attached as **Exhibit J** is a true and correct copy of Georgia Tech’s Student Code of Conduct, which became effective April 2014 and was last revised April 2015.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 20, 2015



Justin Dillon